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 United States of America

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Criminal Case No. 06CR0267-L
)	
Plaintiff,)	DATE: May 19, 2008
)	TIME: 2:00 p.m.
v.)	
)	JOINT MOTION TO CONTINUE STATUS
MICHAEL DANIEL LILLY MARTIN(1),)	HEARING
MELANIE ELIZABETH DEPALMER (2),)	
)	
Defendants.)	
_____)	

NOW COMES plaintiff United States of America, by and through its counsel, U.S. Attorney Karen P. Hewitt and Assistant U.S. Attorney Lawrence A. Casper, and defendants Michael Daniel Lilly Martin and Melanie Elizabeth DePalmer, by and through their counsel respectively, Russell S. Babcock and Knut S. Johnson, and herein jointly request this Court to continue the status hearing currently set for May 19, 2008 at 2:00 p.m. to July 7, 2008 at 2:00 p.m. The basis for this request is as follows:

1. The United States anticipates shortly producing additional discovery materials in this case.
2. The parties are attempting to negotiate a disposition in this matter and require the additional time to complete their discussions.
- 3 To afford sufficient time for the Government to produce the additional discovery materials, to enable defense counsel a sufficient opportunity to review those materials and to enable the parties to complete their discussions, the parties have agreed to continue the status

in this matter until July 7, 2008 at 2:00 p.m.

DATED: May 16, 2008

Respectfully submitted,

KAREN P. HEWITT
United States Attorney

s/Lawrence A. Casper
Lawrence A. Casper
Assistant United States Attorney
Attorneys for Plaintiff
United States of America

s/Russell S. Babcock
Russell S. Babcock, Esq.
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Attorney for Defendant
Michael Daniel Lilly
Martin

s/Knut S. Johnson
Knut S. Johnson, Esq..
Knut@knutjohnson.com
Attorney for Defendant
Melanie Elizabeth-DePalmer

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,) Case No. 08CR0267-L
)
Plaintiff,)
)
v.)
) CERTIFICATE OF SERVICE
MICHAEL DANIEL LILLY MARTIN (1),)
MELANIE ELIZABETH DEPALMER (2),)
)
Defendants.)
_____)

IT IS HEREBY CERTIFIED THAT:

I, Lawrence A. Casper, am a citizen of the United States and am at least eighteen years of age. My business address is 880 Front Street, Room 6293, San Diego, California 92101-8893.

I am not a party to the above-entitled action. I have caused service of the Joint Motion to Continue Evidentiary Hearing on the following parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically notifies them.

1. Russell S. Babcock
2. Knut S. Johnson

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 16, 2008.

s/ Lawrence A. Casper
Lawrence A. Casper